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Cover letter: 3

Technical review: 94

Reviewed by Phil North

Major Issues Identified:

General Issues

- The assessment does not fit any existing EPA models for an assessment.
- The draft assessment contains many inaccurate examples and scenarios so as to question the validity of the analysis.
- Only two hydrologic units are addressed and may not be representative of the other seven.
- The assessment discusses impacts from unproven and unexplored claims.

Chapter 4: Mine Background and Scenario

- Mine scenario is not typical of potential mining in the Bristol Bay watershed.
- Porphyry copper deposits are not typical of all Bristol Bay deposits.
- Mine size is overestimated.
- EPA should not assume that a road or pipeline will be constructed.
- Location of hypothetical mine is not representative of Bristol Bay lands and waters.
- Geochemistry used is not representative of all ores in the region.
- Mitigation measures are not considered in various elements of the hypothetical mine.
- Hypothetical mine not realistic and could not be permitted.
- EPA's methodology is flawed because each mine is unique so a pre-design assessment of mining is not possible.

Chapter 5: Risk Assessment: No Failure

- EPA over estimates habitat loss.
- Assessment lacks a realistic water budget due to lack of specific mining plan.
- EPA came to different conclusions in the review of other mine roads and pipelines.

Chapter 6: Risk Assessment: Failures

- Use of legacy mines for comparison makes statistical prediction false
- Without water treatment design detail the assessment is meaningless.
- EPA's analysis ignores Alaska's record of maintaining water quality.
- Conclusions in the Executive Summary contradict conclusions in

the body of the assessment.

- EPA assumes tailings will be behind a dam.
- EPA assumes closure will be wet.
- Tailings dam failure would be less consequential at other locations, such as Iliamna Lake.